

REDACTED

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

UNITED STATES OF AMERICA,

REDACTED

Plaintiff,

)

v.

)

Criminal Action No. 07-**174**

GARY EARL,

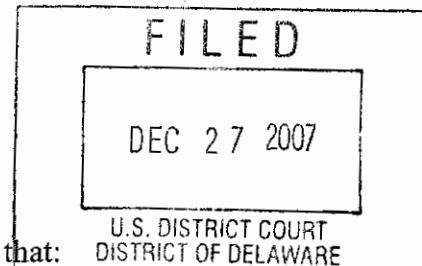
)

Defendant.

)

INDICTMENT

The Grand Jury for the District of Delaware charges that:

**COUNT ONE**

On or about November 28, 2007, in the State and District of Delaware, GARY EARL, defendant herein, did knowingly possess with the intent to distribute fifty (50) grams or more of a mixture and substance containing a detectable amount of cocaine base, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

NOTICE OF FORFEITURE

Upon conviction of the controlled substance offense alleged in Count I of this Indictment, defendant GARY EARL, shall forfeit to the United States pursuant to 21 U.S.C. § 853, any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violation[s], including but not limited to the following:

A. 1995 Cadillac Eldorado, Delaware registration number 403613.

If the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;

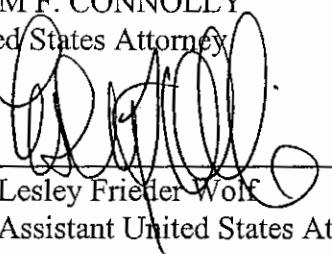
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

A TYPED RIT.

Foreperson

COLM F. CONNOLLY
United States Attorney

BY: 
Lesley Frieder Wolf
Assistant United States Attorney

Dated: December 27, 2007